

Robert W. Seiden

Court-Appointed Temporary Receiver for Link Motion Inc.
Pursuant to The Honorable Judge Victor Marrero of the
United States District Court, Southern District of New York

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VIA ECF

Hon. Valerie Figueredo
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

May 24, 2023

Re: *Baliga, et al. v. Link Motion Inc., et al.*, 1:18-cv-11642-VM-VF

Dear Judge Figueredo,

I write in response to your Honor's April 25, 2023 Order (ECF 410) granting Defendant Vincent Wenyong Shi's ("Shi") letter motion for relief and directing my office to file the Category 3 Documents on the public record in this action. The Category 3 Documents are documents relating to Mr. Lilin "Francis" Guo's ("Mr. Guo") court-approved note agreement. ECF 319 at 1. Simultaneously with submitting this letter, my office files all Category 3 Documents on the public docket. The chart below lists these documents, together with a description of each document and (where applicable) the original ECF number.

ECF No.	Original Filing Date (Sealed)	Original ECF Number (Sealed)	Description of Document
419-1	6/18/2019	N/A	Receiver's letter requesting the Court's approval of proposed note agreement between LKM and Mr. Guo (ECF 71) (the "Note").
419-1	6/25/2019	74	Court endorsement approving the Note
419-2	1/14/2020	119	Receiver's letter to the Court stating that under the Note, there is no requirement for Mr. Guo to cover receivership expenses outside of mainland China
419-2	1/17/2020	120	Court endorsement approving of Receiver's letter dated January 14, 2020
419-3	6/1/2020	N/A	Receiver's letter requesting the Court's approval to convert the outstanding loan balance under the Note into LKM's Class B shares.
419-4	6/5/2020	N/A	Court order approving Receiver's application for conversion of the outstanding loan balance under the Note to LKM's Class B shares.
419-5	6/19/2020	N/A	Receiver's application to the Grand Court of the Cayman Islands ("Cayman Court") seeking approval


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			of conversion of LKM shares that would be issued to Mr. Guo pursuant to the Note.
419-6	7/14/2020	N/A	Cayman Court Order approving conversion of Mr. Guo's LKM shares.
419-7	7/22/2020	N/A	LKM's Board resolution that issued Class B shares to Mr. Guo
419-8	8/30/2021	255	Receiver's letter requesting the Court's approval to convert the outstanding loan balance under the Note into LKM's Class B shares.
419-9	9/8/2021	256	Court order approving Receiver's application for conversion of the outstanding loan balance under the Note to LKM's Class B shares.
419-10	9/13/2021	N/A	Receiver's application to the Cayman Court seeking approval of conversion of LKM shares that would be issued to Mr. Guo pursuant to the Note.
419-11	10/14/2021	N/A	Cayman Court Order approving conversion of Mr. Guo's LKM shares.
419-12	10/19/2021	N/A	LKM's Board resolution that issued Class B shares to Mr. Guo

Please do not hesitate to contact me via email or telephone if you Honor wishes to discuss this matter in more detail.



cc: All Parties (via ECF)

Robert W. Seiden, Esq.
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Motion Inc.